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August 19, 2015

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By Overnight Delivery

Hon. Martin Glenn, USBJ
United States Bankruptcy Court
Southern District of New York
One Bowling Green
New York, New York 1004-1408

Re: In re Residential Capital, LLC et al.
United States Bankruptcy Court
Southern District of New York
Jointly Administered Under Case No. 12-12020 (MG)

Dear Judge Glenn:

This firm is counsel to the ResCap Borrower Claims Trust (the "Trust").

On April 21, 2015, the Court entered its *Memorandum Opinion and Order Sustaining in Part and Overruling in Part the ResCap Borrower Claims Trust's Objection to Claim Number 3862 Filed By Rhonda Gosselin* [Docket No. 8516] (the "Order"). On August 5, 2015, the Court entered the *Order Granting the ResCap Borrower Claims Trust's Motion for Partial Reconsideration* [Docket No. 8972] (the "Reconsideration Order"), which granted the Trust's motion to reconsider the Order as to one of Ms. Gosselin's remaining claims. The Reconsideration Order also instructed the parties to confer regarding settlement of the remaining claims and scheduling of any necessary discovery and briefing schedule for an evidentiary hearing.

Pursuant to the Reconsideration Order, the Trust conferred with Ms. Gosselin's counsel to consensually resolve this matter, but at this time no settlement has been reached. As a result, the parties have agreed to the following schedule to bring this matter to a resolution:

- Discovery shall be completed no later than October 2, 2015.
- An evidentiary hearing will be scheduled on a date convenient for the Court approximately one month after the completion of discovery.

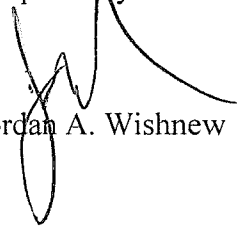
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- Two weeks prior to the scheduled evidentiary hearing, each party shall file with the Court pre-trial memoranda and findings of fact and conclusions of law.
- On week prior to the scheduled evidentiary hearing, each party shall provide the Court and the opposing party with pre-marked exhibits to be used during trial.

A status conference as to this matter is scheduled for August 20, 2015. The Trust respectfully requests that at that time the Court set a date for an evidentiary hearing and enter a scheduling order establishing a discovery and briefing schedule as set forth above.

Respectfully submitted,



Jordan A. Wishnew

Cc: Laird Heal (via e-mail)